



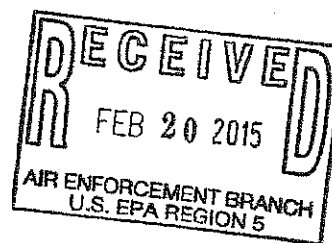
UNIVERSITY OF  
NOTRE DAME

FACILITIES DESIGN AND OPERATIONS

February 16, 2015

**CERTIFIED MAIL**

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Phil Perry  
Branch Chief  
Compliance and Enforcement Branch  
Office of Air Quality  
Indiana Department of Environmental Management  
Mail Code 61-53, IGCN 1003  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

RE: Request for Extension of Compliance Deadline  
40 CFR Part 63, Subpart DDDDD  
University of Notre Dame du Lac  
Notre Dame, Indiana  
Permit No. T141-33677-0013

Dear Mr. Perry:

The University of Notre Dame du Lac (the University) requests that the Indiana Department of Environmental Management (IDEM) grant the University a one (1) year extension of the compliance deadline under 40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Industrial Boilers and Process Heaters* (Boiler MACT). Our request covers Boilers B-1 through B-6, and is submitted in accordance with §63.6(i) of 40 CFR Part 63, Subpart A and §63.7565 and Table 10 of the Boiler MACT. The United States Environmental Protection Agency acknowledged and supported granting of such extensions in the preamble to the most recent promulgation of the Boiler MACT.<sup>1</sup> Details in support of our request are provided below.

As currently permitted, the University's coal-fired boilers (B-2, B-3, and B-4) are controlled by pulse jet fabric filter baghouses (PJFF-1 and 2), a lime sorbent injection system (SI-1), and a powdered activated carbon injection system (SI-2), for particulate, hydrogen chloride (HCl), and mercury (Hg) emissions, respectively. SI-1 and SI-2 were designed and installed to address HCl and Hg emissions limitations in the original Boiler MACT. Likewise, the baghouses were designed assuming sorbent injection rates required to achieve now-superseded emissions rates. Given the increased stringency of the emissions limitations in the final version of the Boiler MACT, the University's control systems require further evaluation and potential modifications.

The University retained a team of outside consultants to conduct an engineering evaluation to determine recommended equipment modifications/upgrades and operational/process changes to the affected boilers and control systems. The team completed the initial phase of the engineering evaluation in November 2014, and provided the University with a recommended Boiler MACT compliance strategy. The University is now progressing toward execution of the recommended compliance strategy, including system design, vendor

<sup>1</sup> 78 Fed. Reg. 7143 (January 31, 2013).

selection, developing final specifications for new/modified equipment, equipment procurement and delivery, needed permitting, construction, commissioning, and emissions testing.

As required by the underlying regulations, and based on preliminary information from its vendors, the University proposes the following compliance schedule in support of the extension request for Boilers B-2, B-3, and B-4. Additionally, the University is evaluating compliance options for Boilers B-1, B-4, B-5, and B-6, including limiting liquid fuel fire on those units to only periods of natural gas curtailment or supply interruption. Commitment to redefining these units as solely designed to burn gas under Boiler MACT requires that the University expend additional resources to evaluate existing infrastructure and negotiate required equipment modifications and pricing with its natural gas supplier. As noted in the below proposed schedule, the University will complete its evaluation for Boilers B-1, B-4, B-5, and B-6 by the end of 2016.

Dates identified are based on the University's current anticipated timeline, and are subject to change based on equipment availability and other unforeseen events.

<i>Milestone</i>	<i>Estimated Initiation Date</i>	<i>Estimated Completion Date</i>
Specify equipment/process modifications for B-2, B-3, and B-4 controls	Third Quarter 2014	First Quarter 2015
General arrangement of design for B-2, B-3, and B-4 controls	Third Quarter 2014	First Quarter 2015
Detailed equipment/system design for B-2, B-3, and B-4 controls	Fourth Quarter 2014	Second Quarter 2015
Required air permit application submitted for B-2, B-3, and B-4 controls	First Quarter 2015	First Quarter 2015
Procure equipment for B-2, B-3, and B-4 controls	First Quarter 2015	Second Quarter 2015
Required air permit received for B-2, B-3, and B-4 controls		Third Quarter 2015
Evaluate classification of B-1, B-4, B-5, B-6	Second Quarter 2015	Fourth Quarter 2016
Deliver equipment for B-2, B-3, and B-4 controls	Second Quarter 2015	Fourth Quarter 2015
Install/modify equipment for B-2, B-3, and B-4 controls	Third Quarter 2015	Second Quarter 2016
Commission/shakedown equipment for B-2, B-3, and B-4 controls	Second Quarter 2016	Third Quarter 2016
Emissions testing for all boilers as required	Third Quarter 2016	Fourth Quarter 2016
Certify compliance for all boilers		January 31, 2017

As demonstrated above, the University will be required to commit significant personnel, time, and economic resources to achieve Boiler MACT compliance in a timely fashion. Accordingly, we respectfully request a one (1) year extension of the compliance deadline until January 31, 2017.

Section 63.10(f) of Subpart A provides that the University may also request a waiver of Boiler MACT-related recordkeeping and reporting requirements during the term of the extension. Accordingly, the University requests that IDEM waive all Boiler MACT-required recordkeeping and reporting until January 31, 2017.

The University agrees to provide IDEM with semi-annual progress reports on its Boiler MACT compliance efforts, with the first report due July 30, 2015. The subsequent reports would be due on January 30 and July 30 of each year until compliance is confirmed.

We are copying Ms. Deena Patton, the IDEM reviewer for the recently-issued Title V Permit Renewal, on this correspondence. The University is available to meet with IDEM representatives in person if needed to discuss our request. In the meantime, please do not hesitate to contact either Julie Johnson of AECOM at (317) 532-5466, or the undersigned at (574) 631-0142 with any questions.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Paul A. Kempf".

Paul A. Kempf, P.E.

Senior Director of Utilities and Maintenance

cc: Deena Patton – Indiana Department of Environmental Management  
Julie S. Johnson – AECOM  
USEPA – Region 5 (AE-17J)  
Charles F. Farrell, P.E., Senior Environmental & Safety Specialist  
Mary Ann F. Saggese – Plews Shadley Racher & Braun LLP

